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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ROGER G. CRANE, JR.,

Plaintiff,

v.

POETIC PRODUCTS LIMITED,

Defendant.

Case No.: 07 Civ. 7063 (BSJ)(FM)

POETIC PRODUCTS LIMITED,

Counterclaimant,

v.

ROGER G. CRANE, JR.,

Counterclaimant Defendant.

**DECLARATION OF JONATHAN JAMES HAYDN-WILLIAMS IN SUPPORT OF  
DEFENDANT-COUNTERCLAIMANT, POETIC PRODUCTS LIMITED'S,  
OPPOSITION TO PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT**

JONATHAN JAMES HAYDN-WILLIAMS declares under penalty of perjury as follows:

1. I am a Solicitor of the Supreme Court of England and Wales and a Partner with the firm Hextalls LLP, English solicitors acting for the defendant-counterclaimant Poetic Products Limited ("PPL") in relation to matters of English law. As such, I am fully familiar with

the facts set forth below. I submit this declaration in support of PPL's Opposition to Plaintiff's Motion for Summary Judgment.

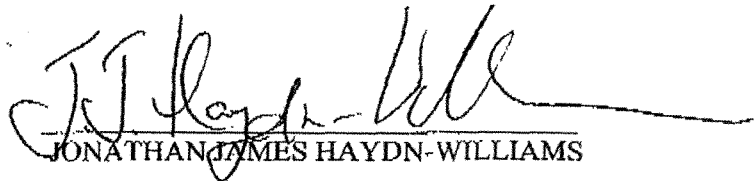
2. Annexed hereto as Exhibit A is a true and accurate copy of June 18, 2007 correspondence from Hextalls LLP to English agent(s) for the Plaintiff.

3. Annexed hereto as Exhibit B is a true and accurate copy of June 22, 2007 correspondence from Hextalls LLP to English agent(s) for the Plaintiff.

4. It is Hextalls LLP's practice to maintain such correspondence in file records in the manner in which they are attached as exhibits hereto.

Under penalties of perjury, I declare that I have read the foregoing and that the facts stated herein are true and correct.

Dated: London, England  
May 7, 2008



JONATHAN JAMES HAYDN-WILLIAMS